

**From:** [Jonathan Goldstein](#)  
**To:** [Chad Pehrson](#); [Robert Harrington](#)  
**Cc:** [David Osborne](#)  
**Subject:** Subpoenas, Depositions and Discovery  
**Date:** Wednesday, December 18, 2024 11:40:52 AM

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- EXTERNAL EMAIL -

Chad and Bobby,

I'm grateful for the call from Bobby earlier today.

To recap what he and I discussed, my clients are not available for depositions on the dates you indicated. Instead of providing new dates, Bobby agreed that you would either send a communication narrowing down what you're looking for or schedule a call with us to better explain what you're after so we can search my client's documents and see what we've got.

Our mutual efforts are now directed at working towards exchanging these documents in full satisfaction of your subpoenas. If necessary, we may be willing to supplement the document production with a sworn declaration or other form of proffer that gets you what you need.

We're not interested in having my clients deposed and would oppose any effort to do so.

I'm also confirming Bobby's assurance to me that you're not seeking to third-party my clients into this matter as defendants and our participation at this stage is predicated on that assurance.

We look forward to hearing from you about whether you'll produce a writing that will guide us in searching for documents or whether you'd rather schedule a call.

I've copied my colleague, David Osbourne. Please copy him on everything going forward. He'll be involved in helping with any document searches.

Thanks!

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